IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Eliseo Rivera Cortés, Gloria Pillot, et al,

Plaintiffs

v.

Airport Catering Services, Corp., Union Independiente de Trabajadores de Aeropuertos

Defendants

Civil No. 98-2092(GG)

CIVIL ACTION

MOTION SUBMITTING SECOND SET OF TRANSLATED RELEASE AGREEMENTS

TO THE HONORABLE COURT:

Comes now Co-Defendant, Airport Catering Services Corp., hereinafter referred to as ACS, represented by its undersigned attorneys and very respectfully states and prays as follows:

| | 1. As ordered by this Honorable Court on its November 8, 2004, C | Order, the | |
|--|--|------------|--|
| appearing party hereby encloses the following second set of translated release agreements: | | | |
| 19. | Release signed by Mr. José Luis Ortiz (plaintiff) | 156-162 | |
| 20. | Release signed by Mr. Norman Ruidíaz (plaintiff) | 163-169 | |
| 21. | Release signed by Mr. Luis Quesada (plaintiff) and related documents | 170-178 | |
| 22. | Release signed by Mr. Alberto Cuadrado (plaintiff) and related documents | 179-187 | |
| 23. | Release signed by Ms. Ramonita Ríos (plaintiff) and related documents | 188-197 | |
| 24. | Release signed by Mr. Andrés Márquez (plaintiff) and related documents | 198-206 | |
| 25. | Release signed by Mr. Felix Pérez (plaintiff) and related documents | 207-215 | |
| 26. | Release signed by Mr. José Betancourt (plaintiff) | 216-222 | |
| 27. | Release signed by Ms. Elsa Cipreni (plaintiff) and related documents | 223-231 | |

| 28. | Release signed by Mr. Pedro Serrano (plaintiff) and related documents | 232-239 |
|-----|---|---------|
| 29. | Release signed by Mr. Daniel Ruiz (plaintiff) and related documents | 240-248 |
| 30. | Release signed by Ms. Josefina Merced (plaintiff) and related documents | 249-258 |
| 31. | Release signed by Mr. José A. González (plaintiff) and related documents | 259-267 |
| 32. | Release signed by Mr. Ceferino Ramos (plaintiff) | 268-274 |
| 33. | Release signed by Ms. Wanda París (plaintiff) and related documents | 275-283 |
| 34. | Release signed by Mr. Edwin Maurás (plaintiff) and related documents | 284-292 |
| 35. | Release signed by Ms. Carmen Marzán (plaintiff) and related documents | 293-301 |
| 36. | Release signed by Mr. Hary Carrillo (plaintiff) and related documents | 302-310 |
| 37. | Release signed by Mr. Luis O. Díaz (plaintiff) and related documents | 311-319 |
| 38. | Release signed by Mr. Rogelio Reyes (plaintiff) and related documents | 320-328 |
| 39. | Release signed by Mr. Héctor Robles (plaintiff) | 329-335 |
| 40. | Release signed by Ms. Ana I. Sandoz (plaintiff) | 336-342 |
| 41. | Release signed by Mr. Victor Velázquez (plaintiff) and related documents | 343-351 |
| 42. | Release signed by Mr. Miguel Falero (plaintiff) | 352-358 |
| 43. | Release signed by Mr. René López (plaintiff) and related documents | 359-367 |
| 44. | Release signed by Mr. Roberto Santiago (plaintiff) and related documents | 368-377 |
| 45. | Release signed by Mr. Rafael Corchado (plaintiff) and related documents | 378-387 |
| 46. | Release signed by Mr. Steven Arroyo (plaintiff) and related documents | 388-396 |
| 47. | Release signed by Ms. Isabel De La Rosa (plaintiff) and related documents | 397-406 |
| 48. | Release signed by Mr. Carlos Molina (plaintiff) and related documents | 407-415 |
| 49. | Release signed by Mr. Roberto Delgado (plaintiff) | 416-422 |
| 50. | Release signed by Mr. Osvaldo Escobar (plaintiff) | 423-429 |
| 51. | Release signed by Mr. Herminio Pérez (plaintiff) and related documents | 430-438 |
| 52. | Release signed by Mr. Miguel A. Santiago (plaintiff) and related documents. | 439-447 |

- 53. Release signed by Mr. José Martínez (plaintiff) and related documents 448-456
- 54. Release signed by Ms. Judith González (plaintiff) and related documents 457-464
- 2. The rest of the translated release agreements will be submitted as they become available.

WHEREFORE, we respectfully request from this Honorable Court to accept the herewith enclosed documents with their corresponding certified translation in English.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day of January, 2005.

I HEREBY CERTIFY that on January 17, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Luis R. Mellado-González, Esq.; José Carreras, Esq.; and Nereida Feliciano Ramos, Esq.

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